

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

REDSTONE LOGICS LLC,

Plaintiff,

v.

NXP USA, Inc..

Defendants.

Case No. 7:24-cv-00028-ADA-DTG

**PLAINTIFF’S ANSWER TO DEFENDANT’S COUNTERCLAIMS**

Plaintiff Redstone Logics LLC (“Redstone”) hereby answers Defendant NXP USA, Inc.’s, (“NXP”) counterclaims as follow:

1. Admit.
2. Admit.
3. Admit.
4. Admit.
5. Admit.

6. Admit that Defendant’s counterclaims arise under the patent laws of the United States and that the Court has subject matter jurisdiction over such claims. Deny any other allegations in this paragraph.

7. Admit.
8. Admit.

**FIRST COUNTERCLAIM: DECLARATORY JUDGMENT OF NON-INFRINGEMENT**

9. Redstone realleges Paragraphs 1-8 as though fully set forth herein and denies any allegation not otherwise admitted above.

10. Deny.

**SECOND COUNTERCLAIM: DECLARATORY JUDGMENT OF INVALIDITY**

11. Redstone realleges Paragraphs 1-10 as though fully set forth herein and denies any allegation not otherwise admitted above.

12. Deny.

13. Deny.

**RELIEF REQUESTED**

In response to NXP's prayer for relieve, Redstone denies that NXP is entitled to any relief, including any of the relief requested in paragraphs A-F of NXP's prayer for relief. Further, Redstone requests the following relief:

WHEREFORE, Redstone respectfully requests that this Court enter:

- A. A judgment in favor of Plaintiff on all counterclaims asserted by Defendant;
- B. An adjudication that Defendant are not entitled to any relief on its counterclaims, including, without limitation, any fine or damages;
- C. A dismissal with prejudice of Defendant's counterclaims;
- D. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Defendant;
- E. Plaintiff's costs of suit against Defendant; and
- F. Any and all other relief as the Court may deem appropriate and just under the circumstances.

**DEMAND FOR JURY TRIAL**

Plaintiff demand a trial by jury on all issues so triable.

Dated: May 1, 2025

Respectfully submitted,

/s/ Reza Mirzaie

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**CERTIFICATE OF SERVICE**

I certify that on May 1, 2025, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Reza Mirzaie  
Reza Mirzaie